

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
New Part 4 of the Commission's Rules)	ET Docket No. 04-35
Concerning Disruptions to Communications)	
)	

COMMENTS OF SYNIVERSE TECHNOLOGIES, INC.

I. INTRODUCTION

Syniverse Technologies is a global supplier of interoperability solutions to more than 300 telecommunications operators throughout North America, Latin America, Asia-Pacific and Europe. Syniverse Technologies offerings include SS7 signaling services, intelligent network services, database services, fraud and carrier access billing solutions, and other service bureau applications. Syniverse Technologies has rich history in the telecommunications industry; we began offering SS7 services in 1987 as a GTE subsidiary, GTE Intelligent Network Services (GTE INS). Syniverse Technologies is based in Tampa, Florida, U.S.A.

Based on our reading of the Notice of Proposed Rulemaking (NPRM), the Commission is seeking comment on extending disruption-reporting requirements to “communications providers” who are not wireline Carriers. The Commission has proposed new benchmarks for reporting and the Commission seeks comment on a proposed streamlined reporting process for communications disruptions. In addition, the Commission seeks consistent

reporting of service disruptions that may have a direct effect on National defense or security.

Syniverse Technologies respectfully requests that third-party providers of signaling be afforded reporting requirements that better reflect how SS7 signaling services are provisioned. Syniverse Technologies has no independent use for our SS7 services except to support the traffic of our Carrier customers. Syniverse Technologies believes negotiated service level agreements between third-party SS7 signaling providers and Carriers that contain provisions outlining outage reporting obligations and service resolution obligations for both the SS7 signaling provider and the Carrier will provide the Commission more accurate reporting and quicker service resolution. Syniverse opposes the proposed rules that separate reporting requirements of the Carrier and the SS7 signaling provider. Syniverse Technologies respectfully requests the Commission to consider collaborative reporting by the Carriers that have chosen to use a third-party for SS7 signaling – which is reflective of the way SS7 signaling services are provisioned.

II. BACKGROUND

Syniverse Technologies is an independent provider of SS7 signaling services. Syniverse Technologies SS7 customers include incumbent local exchange carriers (ILEC), competitive local exchange carriers (CLEC), and commercial mobile radio service (CMRS) carriers. Circuit-switched carriers must have SS7 signaling capability to properly switch and route calls between switches. Carriers may choose to build their own SS7 network,

acquire SS7 network services from a third-party provider (like Syniverse Technologies), or purchase signaling services from the incumbent carrier. Building an SS7 network requires a substantial commitment of capital, and carriers who either do not have the capital resources available or who choose to commit those capital resources to other investment opportunities are left with the choice of purchasing signaling services from a third-party provider or directly from the incumbent LEC. All Syniverse Technologies SS7 customers are facility-based Carriers that operate their own networks and switches. Syniverse Technologies takes pride in our ability to provide highly reliable SS7 signaling services to all Carriers – we have to, that’s our business! We believe that no matter how a Carrier decides to provision SS7 services, service outage reporting and service resolution reporting must recognize both the SS7 service and the telecommunication services supported by SS7. Coordination between the Carrier and the third-party signaling provider must exist to accurately determine benchmarks to report outages and accurately determine service issues associated with resolving outages.

III. THERE ARE FUNDAMENTAL FLAWS IN THE COMMISSION’S CONCLUSIONS CONCERNING OUTAGE REPORTING

Syniverse Technologies agrees that the “data driven, self-improvement” model developed by the FCC for outage reporting should be extended to all communications providers. Syniverse Technologies believes that it is in the public interest to have all Carriers report outages and collaborate to resolve service issues associated with network outages and network design,

especially outages affecting facilities whose importance is essential to the public welfare. By expanding reporting requirements to additional Carriers of telecommunications, the Commission will be able to better monitor network reliability and take steps as needed to prevent or mitigate outages. However, we ask the Commission to consider that third-party SS7 signaling providers have no independent use for our signaling services except to support the traffic exchanged between Carrier networks. Syniverse Technologies believes that negotiated service level agreements with Carriers can provide a process for proper outage reporting and quick service restoral while satisfying Commission requirements. Syniverse Technologies believes that the burden of determining benchmark levels for outages and resolving outages will be extremely onerous for independent signaling providers without coordinating outage reporting and service resolution with our Carrier customers.

Today, Syniverse Technologies has procedures in place to address SS7 network overload. SS7 network overload, due to extraordinary volumes of queries and/or other SS7 network messages, can have a detrimental effect on the performance of an SS7 network. We already, at our sole discretion, employ certain automatic and/or manual overload controls in our SS7 network to safeguard against any detrimental effects. We have processes in place to add capacity to avoid network overload. Syniverse Technologies SS7 Network Technical Support is dedicated to working with our Carrier customer's network staff, as required by our contracts and as required for initial service setup, to address any instances where overload controls are invoked due to overload on our SS7 network. Syniverse Technologies respectfully requests the FCC to recognize that we have processes already in

place that provide immediate corrective actions to remedy an SS7 network overload situation. To require separate outage reporting by a Carrier and their independent provider of SS7 services will not always provide an accurate picture of the “root cause” of the problem or the resolution process. We believe that negotiated service level agreements between third-party signaling providers and Carriers reasonably reflect how to resolve service outage issues. Creating a separate reporting structure for independent SS7 signaling providers fails to recognize that the purpose of SS7 service is to support Carrier voice and data traffic. Recognizing that SS7 service supports Carrier voice and data traffic and allowing third-party SS7 signaling providers to negotiate service level agreements with Carriers will provide a more accurate and cohesive outage reporting and service resolution process for those Carriers that choose to use a third-party for signaling.

Syniverse Technologies believes that proposed modifications to existing rules for final disruption reports to include additional statements regarding engineering standards for full diversity (redundancy) and statements of all the causes of the outage may be unfair to service providers that choose to serve small cities and rural areas. In small cities, rural towns, and less-densely populated LATA's the ability to route traffic in a truly “redundant” fashion may not exist. If there is only one path into town, it's difficult to route traffic in truly redundant paths. Carriers and service providers that serve small towns and rural areas may be disadvantaged by reporting information that describes “lack of redundancy;” this type of data can be used against these Carriers or providers by competitors in marketing collateral as a “service differentiator.” This requirement may not create a fair portrayal of the Carriers' or service providers' ability to provide redundancy.

Syniverse Technologies supports reporting that would separately identify each “root cause” for outages with resolution information; again, we ask for an the ability to negotiate service agreements with Carriers that provides for coordinated reporting and resolution between the Carrier and its SS7 provider.

IV. HOMELAND SECURITY - REPORTING

Syniverse Technologies seeks clarification from the FCC regarding reporting network outages or network anomalies that may be associated with a terrorist threat. Syniverse Technologies monitors our SS7 network continuously, if we discover a network anomaly or network event that could be traced to terrorists (this being a worst-case scenario), we seek clarification on the reporting of these events to the FCC. Will the FCC require additional reporting to other government agencies? Again, we seek clarification to understand how this reporting will be shared across government agencies.

V. CONCLUSION

Syniverse Technologies respectfully requests that Commission consider rule modifications that better reflect how SS7 signaling services are provisioned. Syniverse Technologies can demonstrate that negotiated service level agreements between third-party SS7 signaling providers and Carriers can meet the spirit of the Commission requirements for outage reporting and service resolution without requiring separate reporting by each entity. Separating reporting requirements between independent SS7 signaling

providers and Carriers is confusing because it doesn't recognize that SS7 services only supports the voice and data traffic generated by users on a Carrier network.

In summary, Syniverse Technologies opposes the proposed rule changes. Syniverse Technologies will support rules that promote a coordinated outage reporting and service resolution process between Carriers and their independent SS7 signaling providers. Syniverse Technologies respectfully requests the Commission to consider a process that recognizes collaborative reporting for Carriers that have chosen to use a third-party for SS7 signaling – reflective of the way SS7 signaling services are provisioned. In addition, we seek clarification on reporting requirements for outages or network anomalies that may be associated with threats to national security. Syniverse Technologies appreciates the FCC consideration of our issues. Please do not hesitate to contact us for additional information.



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